

ROBERT S. LARSEN, ESQ.
Nevada Bar No. 7785
DAVID T. GLUTH, II, ESQ.
Nevada Bar No. 10596
WING YAN WONG, ESQ.
Nevada Bar No. 13622
DIONE C. WRENN, ESQ.
Nevada Bar No. 13282
GORDON REES SCULLY MANSUKHANI, LLP
300 South 4th Street, Suite 1550
Las Vegas, Nevada 89101
Telephone: (702) 577-9300
Facsimile: (702) 255-2858
E-Mail: rlarsen@grsm.com
dgluth@grsm.com
wwong@grsm.com
dwrenn@grsm.com

Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DIAMOND RESORTS CORPORATION, a)	Case No.: 2:19-cv-00227-GMN-NJK
Maryland corporation; DIAMOND RESORTS)	
HOLDINGS, LLC, a Nevada limited liability)	STIPULATION AND ORDER TO
company; and DIAMOND RESORTS)	EXTEND TIME TO FILE
INTERNATIONAL, INC, a Delaware corporation,)	RESPONSE TO COMPLAINT [ECF
)	NO. 1]
Plaintiffs,)	
)	FIRST REQUEST
vs.)	
)	
KYLE BROWN, an individual; MARTIN BROWN,)	
an individual; EXCHANGE POINTS CLUB, LLC, a)	
Florida and Missouri limited liability company;)	
PREMIER REWARDS LLC, a Missouri limited)	
liability company; VMG RESORTS LLC, a Missouri)	
limited liability company; VACATION)	
MANAGEMENT GROUP, LLC, a Missouri limited)	
liability company; and OWNER EXTRAS, LLC, a)	
Missouri limited liability company,)	
)	
Defendants.)	

Pursuant to Local Rules 6-1 and 7-1, Plaintiffs DIAMOND RESORTS CORPORATION,
DIAMOND RESORTS HOLDINGS, LLC, and DIAMOND RESORTS INTERNATIONAL,
INC., (“Plaintiffs”), and Defendants, KYLE BROWN, MARTIN BROWN, EXCHANGE

POINTS CLUB, LLC, PREMIER REWARDS LLC, VMG RESORTS LLC, VACATION MANAGEMENT GROUP, LLC, and OWNER EXTRAS, LLC (“Defendants”), by and through their respective attorneys of record, stipulate as follows:

STIPULATION

1. Plaintiffs filed their Complaint on February 6, 2019 [ECF No. 1] alleging causes of action for violations of the Lanham Act, among other claims.

2. Some of the Defendants were served on February 7, 2019, and the remaining Defendants were served thereafter.

3. The current deadline for the Defendants to respond to the Complaint is February 28, 2019.

4. Defendants initially retained a law firm in Las Vegas to represent them in this matter. However, that law firm subsequently advised Defendants that it had a conflict and could not represent Defendants in this case.

5. In the afternoon of February 18, 2019, Defendants were able to regain Gordon Rees Scully Mansukhani to represent them in this lawsuit.

6. However, due to the short time period, Defendants’ attorneys have not had a chance to obtain documents or discuss in detail with the Defendants the allegations of the Complaint.

7. Defendants request an extension to allow them to fully review and respond to the allegations in the Complaint.

8. Defendants request an extension until March 21, 2019 to file their response to the Complaint.

9. The parties have conferred and have agreed to the requested extension and schedule described above.

10. The parties also agree that the Defendants are not waiving their right to seek additional time by means of a motion to this Court should they feel it is necessary.

11. This stipulation is not made for purposes of delay.

///

12. Therefore, the parties agree that Defendants' response to the Complaint is now due on or before March 21, 2019.

DATED: February 22, 2019.

GORDON REES SCULLY
MANSUKHANI, LLP

/s/ Robert S. Larsen

ROBERT S. LARSEN, ESQ.
Nevada Bar No. 7785
300 South 4th Street, Suite 1550
Las Vegas, Nevada 89101

Attorneys for Defendants

DATED: February 22, 2019.

BALLARD SPAHR LLP

/s/ Abran E. Vigil

ABRAN E. VIGIL, ESQ.
Nevada Bar No. 7548
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135

Attorneys for Plaintiffs

ORDER

IT IS SO ORDERED.


United States Magistrate Judge

DATED: February 25, 2019